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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	) No.
	)
Plaintiff,	)
	)
v.	) <u>COUNT 1:</u>
	) SEXUAL EXPLOITATION OF A
	) CHILD – PRODUCTION OF CHILD
TIMOTHY WADE SWENSEN, JR.,	) PORNOGRAPHY
	) Vio. of 18 U.S.C. § 2251(a) and (e)
Defendant.	)
	) <u>COUNT 2:</u>
	) SEXUAL EXPLOITATION OF A
	) CHILD – DISTRIBUTION OF CHILD
	) PORNOGRAPHY
	) Vio. of 18 U.S.C. § 2252A(a)(2)(A),
	) (b)(1)
	)
	) <u>COUNT 3:</u>
	) SEXUAL EXPLOITATION OF A
	) CHILD – POSSESSION OF CHILD
	) PORNOGRAPHY
	) Vio. of 18 U.S.C. § 2252A(a)(5)(B),
	) (b)(2)
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## INFORMATION

The United States charges that:

### COUNT 1

Between a date unknown to the United States, and on or about May 12, 2021, in the District of Alaska, the defendant, TIMOTHY WADE SWENSEN, JR., did employ, use, persuade, induce, entice, and coerce a minor, to wit: VICTIM 1, with the intent that such minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce; was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and was transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce.

All of which is in violation of 18 U.S.C. § 2251(a), (e).

### COUNT 2

Between a date unknown to the United States, and on or about May 12, 2021, in the District of Alaska, the defendant, TIMOTHY WADE SWENSEN, JR., did knowingly distribute any child pornography, depicting VICTIM 1, using any means and facility of interstate and foreign commerce and that has been mailed, and has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All of which is in violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).

### COUNT 3

Between a date unknown to the United States, and on or about May 12, 2021, in the District of Alaska, the defendant, TIMOTHY WADE SWENSEN, JR, did knowingly possess or knowingly access with intent to view any book, magazine, periodical, film, videotape, computer disk, and any other material that containing an image of child pornography that had been mailed, and shipped and transported using any means or facility of interstate or foreign commerce and in and affecting interstate or foreign commerce by any means, including by computer, and that was produced using materials that were mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All of which is in violation of 18 U.S.C. § 2252A(a)(5)(B), (b)(2).

### SPECIAL ALLEGATION

The United States further alleges that prior to the commission of the offenses charged in Counts One through Three of the Information, the defendant TIMOTHY WADE SWENSEN, JR., had been previously convicted on February 14, 2011 of one count of Sexual Assault in the Second Degree in violation of AS 11.41.410(a)(1) by the State of Alaska in case 3AN-10-08592CR, a prior conviction under the laws of any State relating to aggravated sexual abuse, and sexual abuse.

s/ Adam Alexander  
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United States of America